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7 Attorney for Tina Chen

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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 TINA CHEN,

15 Defendant.  
16

Case No. 2:21-CR-00139-APG-BNW

**STIPULATION TO CONTINUE  
DEFENSE EX-PARTE BRIEFING  
DUE DATE**  
(First Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
18 United States Attorney, and Jessica Oliva, Assistant United States Attorney, counsel for the  
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Heidi A.  
20 Ojeda, Assistant Federal Public Defender, counsel for Tina Chen, request that the due date of  
21 Defense Ex-parte briefing, currently due on May 31, 2022, be vacated and set to a date and time  
22 convenient to this Court, but no sooner than one hundred and twenty (120) days.

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1 The Stipulation is entered into for the following reasons:

2 1. The parties will be contemporaneously filing a motion to continue the trial date  
3 in this case. The parties are also in the process of trying to resolve this case, which would  
4 eliminate the need of the Court to perform further review of the documents pursuant to the  
5 protective order.

6 This is the first stipulation to continue filed herein.

7 DATED this 13th day of May 2022.

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9 RENE L. VALLADARES  
10 Federal Public Defender

JASON M. FRIERSON  
United States Attorney

11 By /s/ Heidi A. Ojeda

By /s/ Jessica Oliva

12 HEIDI A. OJEDA  
Assistant Federal Public Defender

JESSICA OLIVA  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3  
4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 v.

7 TINA CHEN,

8 Defendant.

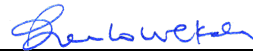
Case No. 2:21-CR-00139-APG-BNW

ORDER

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10 ORDER

11 IT IS THEREFORE ORDERED that upon consideration of the parties' request to  
12 extend the deadline for filing the Court's ordered ex-parte briefing, that the due date of the  
13 Defense Ex-parte briefing, currently due on May 31, 2022, be vacated and continued to  
14 September 9, 2022.

15 DATED this 16th day of May 2022.

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17 United States Magistrate Judge  
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